

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Brandon. Rondon	)	
an individual,	)	
	)	
Plaintiff,	)	Case No. 1:24-vcv-01494
	)	
v.	)	
	)	
Allstate Insurance Company	)	
	)	
Defendant.	)	

**DECLARATION OF BRANDON RONDON**

I, Brandon Rondon, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that the following is true and correct:

1. My name is Brandon Rondon. I am the plaintiff in this matter. I submit this declaration in response to the Court's order directing me to explain why I did not timely produce certain tax returns and why I failed to file a written opposition to Defendant's motion to compel. I respectfully request that the Court not impose sanctions upon me.
2. Since 2021, I have retained and relied upon the services of Abdelaziz Dallaly, a certified public accountant with specialized experience in preparing tax returns for insurance agents such as myself. Mr. Dallaly has consistently prepared both my personal and business tax returns for the years 2021 through the present.
3. Mr. Dallaly is Moroccan by nationality and customarily spends extended periods of time in Morocco. His travel and presence abroad have at times delayed my receipt of finalized tax documents.

4. In 2023, I was required to file amended tax returns for the tax years 2021 through 2023 in order to qualify for a refinance of the mortgage on my home. I engaged Mr. Dallaly to handle the preparation and filing of those amended returns.
5. I have already produced to Defendant all my business tax returns for the years 2019 through 2023. I have also produced my personal tax returns for the years 2019 through 2021.
6. I have not yet produced my 2022 and 2023 personal tax returns because I am awaiting the amended versions from my accountant, Mr. Dallaly. When we spoke on the evening of September 30, 2025, he informed me they would be completed by Thursday, October 2, 2025. I intend to produce the returns promptly upon receipt. Out of caution, I commit to producing them no later than Monday, October 6, 2025.
7. With respect to the 2024 tax year, I have not yet filed either my personal or business returns because timely extensions were filed. Accordingly, I do not yet possess completed returns for 2024. Upon filing of the 2024 returns, I will produce both my personal and business returns in full.
8. My failure to file a written response to the motion to compel by September 19, 2025, as ordered by the Court, was due in substantial part to a transition in my legal representation. My prior local counsel, Brent Holmes, initiated withdrawal from the case in September 2025. On October 1, 2025, my new local counsel, Mitchell S. Chaban of Latimer LeVay Fyock, LLC, filed his appearance. Because of this transition, no opposition was filed by the September 19 deadline.
9. I did not intend to disregard the Court's authority or orders. Rather, I was in the midst of transition between attorneys when the response deadline expired.

10. I sincerely apologize to the Court for the delay in both producing certain tax returns and in filing a timely response to the motion to compel. I recognize the importance of compliance with discovery obligations and Court orders and will continue to make every effort, with the assistance of my new counsel, to ensure full compliance moving forward.
11. I reaffirm my commitment to promptly produce all outstanding documents, including the amended 2023 personal return as soon as received from my accountant and the 2024 returns immediately upon filing.
12. I respectfully ask the Court to take these circumstances into consideration and not impose sanctions. My noncompliance was not intentional, but the result of delays associated with my accountant's availability, the timing of amended return preparation, and the transition between counsel.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 1 day of October 2025, at Edmond, Oklahoma.  
(city) (state)

By: Brandon Rondon  
Brandon Rondon

4905-6644-6190, v. 1

# CERTIFICATE *of* SIGNATURE

REF. NUMBER  
VBIXH-UP7ES-EWH3U-GRXNS

DOCUMENT COMPLETED BY ALL PARTIES ON  
01 OCT 2025 21:11:14  
UTC

## SIGNER

**BRANDON RONDON**

EMAIL  
BRANDON@RONDONINS.COM

## TIMESTAMP

SENT  
01 OCT 2025 21:10:54

VIEWED  
01 OCT 2025 21:11:05

SIGNED  
01 OCT 2025 21:11:14

## SIGNATURE



IP ADDRESS  
75.31.45.105

LOCATION  
EDMOND, UNITED STATES

## RECIPIENT VERIFICATION

EMAIL VERIFIED  
01 OCT 2025 21:11:05

